

UNITED STATES DISTRICT COURT
DISTRICT OF NORTHERN GEORGIA
ATLANTA DIVISION

AUG 13 2014

JAMES N. HATTEN, Clerk
By: *[Signature]* Deputy Clerk

Adrian Martinez Montanez,

Movant,

v.

Case No.: 1:11-CV-1456-CAP-ECS
1:11-CR-239-CAP-ECS

United States of America,

Respondent.

_____ /

**MOTION FOR AN EXTENSION OF TIME TO REPLY
TO THE GOVERNMENT'S RESPONSIVE BRIEF**

Mr. Montanez requests this court extend the time for filing a reply to the government's responsive brief until September 15, 2014, in order to allow him adequate time to develop his brief.


Full exposition of the issues will require a significant effort that cannot be timely completed under the combination of current prison conditions and Mr. Montanez's lack of either legal training or writing experience.

At Coleman Low, access to legal resources is limited to, at the most, 18 hours a week. These resources (shared among 1800 inmates) include 18 legal computer workstations, 6 general purpose ribbon-style typewriters, 1 mail-weighing scale, and a single copier. Mr. Montanez is an incarcerated indigent and he is proceeding pro se. He is inexperienced in the law and must depend on the pro bono assistance of other inmates to help him with

preparing and writing his brief. Frank L. Amodeo has agreed to help Mr. Montanez, but in order to effectively help Mr. Montanez, an extension of time is required.

For the foregoing reasons, Mr. Montanez respectfully requests this court to extend the time for filing a reply until September 15, 2014.

Respectfully submitted this 4th day of August 2014 by:



Adrian Martinez Montanez
Reg. #22993-171
Federal Correctional Complex
Coleman - Low, Unit C3
P.O. Box 1031
Coleman, Florida 33521-1031

CERTIFICATE OF SERVICE

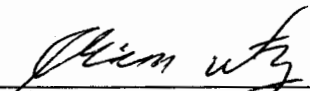
This motion was delivered in a pre-addressed, postage-paid envelope to the prison mailing authorities on the same day as signed. The United States of America is represented by counsel who is registered with the CM/ECF docketing system: thus the movant requests that notice of the filing and service of this motion on the United States occur through that system's electronic medium.



Adrian Martinez Montanez

VERIFICATION

Under penalty of perjury as authorized in 28 U.S.C. §1746, I declare the factual allegations and factual statements contained in this motion are true and correct to the best of my knowledge.



Adrian Martinez Montanez

Adrian Martinez Montanez #22993-171
Federal Correctional Complex
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P.O. Box 1031
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